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Attorneys for Defendants
8 FOXCONN ELECTRONICS, INC.,
FOXCONN TECHNOLOGY CO., LTD., and
9 HON HAI PRECISION INDUSTRY CO., LTD.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13

14 ATS AUTOMATION TOOLING
15 SYSTEMS, INC. AND THERMAL
16 FORM & FUNCTION, LLC,

Plaintiffs,

17 vs.

18 FOXCONN ELECTRONICS, INC.,
19 FOXCONN TECHNOLOGY CO., LTD.,
20 HON HAI PRECISION INDUSTRY CO.,
LTD.,

Defendant.

CASE NO. C03-2648 PJH (EDL)

**DECLARATION OF PETER J. WIED IN
SUPPORT OF DEFENDANTS MOTIONS
IN LIMINE**

Date: August 18, 2005
Time: 2:30 p.m.
Judge: The Honorable Phyllis J. Hamilton

1 I, Peter J. Wied, declare:

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3 1. I am an attorney at law licensed to practice before the Courts of the State of
4 California and before this Court. I am an associate with the law firm of Paul, Hastings, Janofsky
5 & Walker LLP, attorneys of record for Foxconn.

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7 2. If called as a witness, I would and could competently testify thereto to all
8 facts within my personal knowledge except where stated upon information and belief.

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10 3. Attached hereto as Exhibit A is a true and correct copy of the November
11 15, 2004 Stipulated Request for Modification of Expert Discovery Deadlines and Order.

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13 4. Attached hereto as Exhibit B is a true and correct copy of the Supplemental
14 Report of Dr. Robert J. Moffat dated June 30, 2005.

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16 5. Attached hereto as Exhibit C is a true and correct copy of excerpts from the
17 Deposition of Robert DeHoff on July 21, 2004.

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19 6. Attached hereto as Exhibit D is a true and correct copy of excerpts from the
20 Deposition of Bruce Seeley on January 7, 2005.

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22 7. Attached hereto as Exhibit E is a true and correct copy of the Expert Report
23 of Dr. Robert J. Moffat dated December 8, 2004.

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25 8. Attached hereto as Exhibit F is a true and correct copy of the Report of
26 Expert William Maltz in Response to Report of Dr. Robert J. Moffat dated January 12, 2005.

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28 9. Attached hereto as Exhibit G is a true and correct copy of the Court's

1 Order re Motions for Summary Judgment and Supplemental Claim Construction dated May 20,
2 2005.

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4 Executed this 19th day of July, 2005, at Los Angeles, California.

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8 By: /s/ Peter J. Wied

9 PETER J. WIED
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